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12

13 **UNITED STATES DISTRICT COURT**

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15 **NORTHERN DISTRICT OF CALIFORNIA**

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17 **SAN FRANCISCO DIVISION**

18 IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

19 This Document Relates to:

20 ALL ACTIONS

21 Case No. 3:23-md-03084-CRB

22 **DEFENDANT UBER TECHNOLOGIES,
INC., RAISER, LLC, AND RAISER-CA,
LLC'S BRIEF IN SUPPORT OF UBER'S
PRIVILEGE CLAIMS CHALLENGED BY
PLAINTIFFS FOR THE BUSHRA FAIZ
CUSTODIAL FILE – PURSUANT TO
SPECIAL MASTER ORDER NO. 3 (DKT.
2472)**

1 Pursuant to Special Master Order No. 3, I (4) (Dkt. 2472), Defendants submit this brief in
 2 support of their position on the remaining privilege challenges for custodian Bushra Faiz. On March
 3 25, 2025, Plaintiffs challenged approximately 29 documents within this custodial file. Through
 4 conferrals, the parties have narrowed their dispute to 7 challenges. These challenges are now
 5 submitted for the Special Master's review.

6 Defendants incorporate by reference the legal standard and arguments set forth in their prior
 7 briefing (Dkts. 2433, 2461, 2528, 2544, and 2580). As explained more fully in the prior briefs, the
 8 applicable legal standard and the factual material previously provided to the Special Master,¹ when
 9 reviewed in conjunction with the challenged documents and the associated metadata fields, support
 10 Uber's privilege and work product assertions. The remaining privilege claims submitted for the
 11 Special Master's determination should be upheld.

12 DATED: April 18, 2025

13 Respectfully submitted,

14 **SHOOK HARDY & BACON L.L.P.**

15 By: /s/ Maria Salcedo
 16 MARIA SALCEDO

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25 ¹ As requested by the Special Master, Uber has provided (1) a glossary of terms commonly used in
 26 disputed documents, (2) a list of names and titles of relevant Uber inside and outside counsel, and
 27 (3) a digest of third-parties present in its privilege log. Defense counsel will also be available for
 any questions the Special Master may have during the review process.

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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

/s/ Maria Salcedo
MARIA SALCEDO